

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**R'KES STARLING, individually and behalf of all
others similarly situated, Plaintiff,**

-VS-

Case No.: Case No. 1:24-cv-00991-DII

**PR ADVISORS, LLC, D/B/A PINNACLE
REALTY ADVISORS and RAM PROPERTIES,
LLC, Defendants.**

MOTION FOR ADMISSION *PRO HAC VICE*

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now A. Paul Heeringa, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas *pro hac vice* to represent PR Advisors LLC in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of)
- Manatt, Phelps & Phillips LLP**

with offices at

Mailing address: **151 N. Franklin Street, Suite 2600**

City, State, Zip Code: **Chicago, IL 60606**

Telephone: **312.529.6300**

Facsimile: **312.529.6315**

Email: **pheeringa@manatt.com**

2. Since 5/4/2006 ☒, Applicant has been and presently is a member of and in good standing with the Bar of the State of Illinois ☒.

Applicant's bar license number is 6288233.

3. Applicant has been admitted to practice before the following courts:

Court:

Admission date:

See attached admissions list.

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

N/A

5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided below:

N/A

6. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

7. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

8. Select one:

☐ Applicant has on file an application for admission to practice before the United States District Court for the Western District of Texas.

☒ Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: LEONCIO A. GIL, III (Texas Bar # 24094204)

Mailing address: SCHEEF & STONE, L.L.P., 2600 Network Blvd., 

City, State, Zip Code: Frisco, Texas 75034

Telephone: (214) 472-2100

9. Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 *pro hac vice* fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: **Clerk, U.S. District Court**].


10. Should the Court grant applicant's motion, Applicant shall register as a filing user within 10 days of this order, pursuant to Administrative Policies and Procedures for Electronic Filing in Civil and Criminal Cases in the Western District of Texas.

Wherefore, Applicant prays that this Court enter an order permitting the admission of

A. Paul Heeringa to the Western District of Texas *pro hac vice*
for this case only.

Respectfully submitted,


A. Paul Heeringa
[printed name of Applicant]


[signature of Applicant]

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 10th day of December, 2024.

A. Paul Heeringa
[printed name of Applicant]


[signature of Applicant]